

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MARYLAND  
Greenbelt Division**

In re

Case No. 24-13609-MCR

Smokecraft Clarendon, LLC

Chapter 11

Debtor.

/

**CONSENT MOTION TO CONTINUE CONFIRMATION HEARING**

Comes now Smokecraft Clarendon, LLC (“Smokecraft” or the “Debtor”), by and through undersigned counsel, pursuant to Local Rule 9013-7, and moves to continue the confirmation hearing set in the above-captioned matter for October 29, 2024, to a date certain after December 1, 2024, and in support thereof notes as follows:

A variety of reasons support a short continuance of the confirmation hearing herein, past December 1, 2024. First, the Debtor remains engaged in substantive conversations with other major stakeholders, in hopes of working toward a consensual confirmation or, at minimum, a confirmation hearing that can be focused on a more discreet set of issues. Second, the Debtor has recently received an appraisal for all of its personal property, which has been circulated to counsel for the correlative lienholder and the United States Trustee, with there being genuine hopes such may advance the aforementioned discussions and invite a further narrowing of issues. Third, as a byproduct of having now received an appraisal, the Debtor anticipates amending the plan herein not later than Friday, November 1, 2024, so as to reflect a differentiated liquidation analysis and a revised assessment of the scope of secured claims.

Fourth, on a more logistical front, undersigned counsel is apparently proceeding to trial in a case in Florida for three days, commencing on Monday, October 28, 2024. (There had existed some skepticism as to whether the trial would actually proceed; it now appears that, absent an

eleventh hour compromise, trial will actually be occurring.) And, fifth, on an equally logistical front that bodes well for this case, the Debtor has received an unusual volume of catering orders for the week of October 28, 2024 and, as such, the Debtor's principal believes he may have difficulty exiting the restaurant and traveling to court, with his efforts and attention being needed to fulfill the subject orders.

The continuance sought herein—past December 1, 2024—is designed to both allow time to circulate an amended plan (and, if need-be, ballot an amended plan), and to address a temporal conflict of a personal nature on the part of counsel for one of the parties in this case. The continuance is relatively short in nature, will not invite any prejudice, and is being proposed with the consent of both Capital Bank and the United States Trustee.

WHEREFORE, Smokecraft Clarendon, LLC respectfully prays this Honorable Court (i) continue the currently scheduled confirmation hearing from October 29, 2024 to a date after December 1, 2024; and (ii) afford such other and further relief as may be just and proper.

Respectfully submitted,

/s/ Maurice B. VerStandig  
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*Counsel for the Debtor*

*[Certificate of Service on Following Page]*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 24th day of October, 2024, a copy of the foregoing was served electronically upon filing via the ECF system on all counsel who have entered an appearance herein, including:

- Corinne Donohue Adams cadams@yvslaw.com, cadams@yvslaw.com;jbeckman@yvslaw.com;pgomez@yvslaw.com;vmichaelides@yvslaw.com;yvslawcmech@gmail.com;r39990@notify.bestcase.com
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/s/ Maurice B. VerStandig  
Maurice B. VerStandig, Esq.